UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)		• • •
)		
v.)	Criminal No. 03-30047-MAP	
)		
)		
MELVIN RICHARDSON,)		
Defendant.)		

PARTIES' JOINT MOTION TO CONTINUE

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and counsel for the defense, hereby file their joint motion to continue the scheduled status conference from June 21, 2004 until July 13, 2004 at 2:45 p.m. The parties rely on the following in support thereof.

The Special Assistant United States Attorney assigned to this case has a medical appointment for his infant son with Pediatric Pulmonologist, Dr. Francis Duda, on the scheduled conference date. The appointment is related to an obstructive apnea condition that is being treated by Dr. Duda. The defendant, through his attorney, consents to this motion requesting a new date for status conference.

Additionally, the defendant has recently received the name of the cooperating individual involved in the case and needs additional time to file discovery motions. This request does not cause undue delay, and is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

Bv:

AMES R. GOODHINES

Special Asst. U.S. Attorney

/s,

VINCENT BONGIORNI, Esq. Counsel for Defendant

Date: June 21, 2004

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts June 21, 2004

I, James R. Goodhines, Special Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to counsel of record.

AMES R. GOODHINES

Special Asst. U.S. Attorney

Date: June 21, 2004